

FILED 09 JUN '20 17:42 USDC-ORP

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA

v.

ANNDREA D. JACOBS,

Defendant.

20 e18
3:19-cr-00177-HZ

INDICTMENT

18 U.S.C. § 1344(2)

Forfeiture Allegation

THE GRAND JURY CHARGES:

COUNT 1
(Bank Fraud)
(18 U.S.C. § 1344(2))

On or about October 3, 2019, in the District of Oregon and elsewhere, ANNDREA D. JACOBS, defendant herein, did execute a scheme or artifice to obtain funds under the custody or control of Wells Fargo Bank, N.A., a federally insured financial institution, by means of materially fraudulent pretenses and representations, in that defendant negotiated check number 1281503, which had been drafted on U.S. Bank account number ****2027 and made payable to Victim Company 1 in the amount of \$6,749.59, by purporting to deposit said check into her own account number ****8392 at Wells Fargo Bank, N.A., when defendant then and there knew that

///

///

Indictment

the payee had neither endorsed the check nor otherwise authorized defendant to negotiate it, all in violation of Title 18, United States Code, Section 1344(2).

FORFEITURE ALLEGATION

1. The allegations contained in Count 1 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 982(a)(2)(A).

2. Upon conviction of the offense charged in this Indictment, the defendant, ANNDREA D. JACOBS, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation. The property to be forfeited includes, but is not limited to, a money judgment in an amount of up to \$6,749.59.

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

///

///

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c)

All pursuant to 18 U.S.C. § 982(a)(2)(A) and 28 U.S.C. § 2461(c).

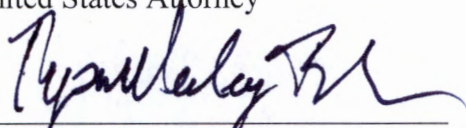
Dated: June 9, 2020

A TRUE BILL.

 OFFICIATING FOREPERSON

Presented by:

BILLY J. WILLIAMS
United States Attorney



RYAN W. BOUNDS, OSB #00012
DONNA BRECKER MADDUX, OSB #023757
Assistant United States Attorneys